South Zone Travel Management Revision Project

Errata to the Final Environmental Assessment

Kaibab National Forest Coconino and Yavapai Counties, Arizona





South Zone Travel Management Revision Project Environmental Assessment

Errata Sheet

September 2016

The South Zone Travel Management Revision Project Final Environmental Assessment (EA) was released in January 2016. This errata sheet documents corrections to the text of the published EA and should be reviewed along with the final EA. These corrections reflect instruction provided by the Reviewing Officer in the 36 CFR Part 218 objection process for the proposed decision in a letter dated May 19, 2016. These corrections are consistent with direction in Forest Service Handbook 1909.15, Chapter 10, Section 18.4, on the use of errata sheets to make simple corrections. There are no changes to the project or significant new circumstances that would affect the analysis and conclusions in the South Zone Travel Management Revision Project Final Environmental Assessment; therefore, a supplement to or revision of the EA is not needed.

The purpose of this errata sheet is to eliminate use of the term "area" in the EA when referring to exceptions to the general prohibitions on motor vehicle use allowing limited motor vehicle use within a specified distance from designated NFS roads for purposes of dispersed camping (hereinafter referred to as "motorized dispersed camping" or "MDC"). As explained in the Decision Notice and Finding of No Significant Impact for this designation decision, MDC does not constitute an "area" for purposes of the TMR. Therefore, the minimization criteria do not apply to MDC. No "areas" as defined in 36 CFR 212.1 of the TMR are established in the South Zone Travel Management Revision Project or otherwise exist in the South Zone.

Any use of the term "area" in the final EA in reference to MDC is hereby replaced with the term "MDC." The following clarification is provided for specific content in the final EA that erroneously uses the word "area" in reference to MDC. Any other use of the word "area" in the EA is consistent with its common definition, i.e., a particular extent of space. The following shows specific text deleted from the EA using strike-through and specific text added to the EA using underlining.

• Pages 13-14, "Application of Minimization Criteria." This section is corrected by replacing the stricken text with the underlined text as follows:

The Travel Management Rule directs Forest Service responsible officials to, when designating areas for motorized use, "consider effects on the following, with the objective of minimizing:

- Damage to soil, watershed, vegetation, and other forest resources;
- Harassment of wildlife and significant disruption of wildlife habitats;
- Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and
- Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands." (36 CFR 212.55(b)(1-4)

These factors are known as "minimization criteria." In developing the camping corridors and road system changes considered in this analysis, the previous South Zone travel management analyses, and their application of the minimization criteria, served as a basis for the initial proposals. The initial suitability of additional corridor areas and road system changes proposed through public and internal feedback was evaluated geospatially and using the site-specific knowledge and professional judgment of project interdisciplinary team members. Factors including soils, vegetation type, cultural resource densities and

site locations, wildlife habitat, and recreational use informed this evaluation. Where adverse impacts were determined to be likely to occur, the camping corridor or road in question was eliminated from consideration. Although the MDC locations and road system changes considered in this analysis were subjected to this initial screening, if additional adverse impacts are found to be likely the appropriate adjustments will be made and reflected in the final decision or addressed through adaptive management.

With regard to conflicts between motor vehicle use and other recreational use or among different classes of motor vehicle uses, MDC are proposed in locations in which the project interdisciplinary team determined substantial motorized camping use already occurs. As proposed, depending upon the alternative, the camping corridors would occupy between 0.6 percent and 2.3 percent of the land area of the South Zone. Thus, between 97 percent and 99.4 percent (depending on alternative) of the land area of the Kaibab South Zone would remain unaffected by camping corridor designation. Because of the limited area of the districts affected by camping corridors, and because substantial motorized camping use already occurs in the areas covered by proposed camping corridors, user conflict is minimized in that it is unlikely additional conflict would occur as a result of camping corridor designation. Furthermore, providing camping corridors would have the overall effect of increasing the ability of campers to locate their camps away from others, which would likely reduce conflict between campers.

The Forest Service's travel management rule (TMR) authorizes the Forest Service to include in the designation of National Forest System (NFS) routes the limited use of motor vehicles within a specific distance of those roads for the purpose of dispersed camping (hereinafter "motorized dispersed camping" or "MDC"). The EA provides for authorization of MDC off designated roads.

MDC does not constitute an "area" as defined by the TMR. The TMR defines an "area" as "a discrete, specifically delineated space that is smaller, and, [except for over-snow vehicle use,] in most cases much smaller, than a Ranger District." For purposes of the TMR, an "area" is a large, open space where cross-country motor vehicle use may generally occur in accordance with limitations of the designation by members of the public. Areas designated for motor vehicle use under the TMR have natural resource characteristics that are suitable for cross-country wheeled motor vehicle use or are so altered by past events that wheeled motor vehicle use is appropriate. Examples include sand dunes, quarries, the exposed bed of draw-down reservoirs, and other small places with clear geographic boundaries. Forest Service Manual (FSM) 7715.73, para. 3. Management objectives must be established and documented for designated areas. FSM 7715.73, para. 7. Motor vehicle use in a designated area may not be restricted by type of activity, only by vehicle class and, if appropriate, time of year. FSM 7715.73, para. 8.

In contrast, the Forest Service's authority to allow MDC is a limited exception to the general prohibition on cross-country motor vehicle use in the TMR. Authorization of MDC provides for only limited use of motor vehicles within a limited distance of forest routes (i.e., limited linear, rather than cross-country, motor vehicle use) and only for the limited purpose of dispersed camping.

This interpretation is reinforced by the rationale for including the authority for MDC in the final TMR, which expressly distinguishes between that authority and designated areas:

<u>Comment.</u> Some respondents [commenting on the proposed TMR] stated that the final rule should expand the definition of area to encompass specific uses, such as grazing, hunting, firewood gathering, camping, and religious, customary, and cultural practices...

¹ National administrative policy, procedure, and guidance to Forest Service employees regarding the conduct of Forest Service activities are issued by the Chief of the Forest Service as directives to the Forest Service Directive System. 36 CFR 200.4(b)(1). The Directive System consists of the FSM and Forest Service Handbooks (FSH). 36 CFR 200.4(b)(1). The directives in the FSM and FSH implementing the TMR were published in the *Federal Register* for public notice and comment. 72 Fed. Reg. 10632 (Mar. 9, 2007); 73 Fed. Reg. 74689 (Dec. 9, 2008).

Response. ... To address specific local needs for limited cross-country motor vehicle use for big game retrieval or dispersed camping, the Department is adding a paragraph to § 212.51 of the final rule. This new paragraph provides that in designating routes, the responsible official may include in the designation the limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of big game retrieval or dispersed camping. Some areas of high route density may be appropriate for designation as areas. Others will not. The Department believes that designation decisions should be made at the local level, based on site-specific evaluation of local conditions and public involvement.²

70 Fed Reg. 68274. The Department's response to comments on the proposed TMR further explains that MDC can also be authorized by permits. 70 Fed. Reg. 68285. Permits holders are exempt from the prohibition on cross-country motor vehicle use. 70 Fed. Reg. 68285. The distinction between designated areas and authorization of MDC is also reinforced by the preamble to the final directives implementing the TMR, which makes clear that MDC is an exception to the prohibition on cross-country motor vehicle use. 73 Fed. Reg. 74689, 74690-74691 (Dec. 9, 2008).

The minimization criteria in 36 CFR 212.55(b) of the TMR apply only to trails and areas. Therefore, the minimization criteria in 36 CFR 212.55(b) do not apply to MDC. Only the general criteria in 36 CFR 212.55(a), quoted below, apply to MDC in this EA:

In designating National Forest System [NFS] roads... trails... and areas... for motor vehicle use, the responsible official shall consider effects on [NFS] natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of [NFS] lands, the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration.

As described throughout the EA and project record, these general criteria were considered during development of this designation decision and analysis of its effects.

Although the minimization criteria in 36 CFR 212.55(b) do not apply to authorization of MDC under the TMR, the KNF strove to minimize impacts in connection with authorization of MDC under the designation decision. Specifically, the KNF evaluated geospatially and with the site-specific knowledge and professional judgment of project interdisciplinary team members the suitability of authorizing more MDC proposed through public and internal input. Factors including soils, vegetation type, cultural resource densities and site locations, wildlife habitat, and recreational use informed this evaluation. Where adverse impacts were determined to be likely to occur, the MDC in question was eliminated from consideration. Moreover, if additional adverse impacts related to these factors are found to be likely, appropriate adjustments will be made and addressed through the adaptive management strategy, consistent with the TMR.

MDC is proposed in locations in which the project interdisciplinary team determined substantial MDC already occurs. As proposed, depending upon the alternative, MDC would occur in only 0.6 to 2.3 percent of the South Zone. Thus, between 97 percent and 99.4 percent (depending on the alternative) of the South Zone would remain unaffected by MDC. Impacts are minimized to the extent substantial MDC already occurs in the locations where it is proposed; to the extent only a limited percentage of the South Zone would be affected by the proposed MDC; and to the extent campers can camp away from other campers.

• Page 150, response to comment 10-6. The final sentence of the first paragraph of the Forest Service response incorrectly refers to MDC as "areas" and incorrectly applies the minimization criteria to MDC. This sentence is deleted from the EA, as shown below in strike-through:

As an agency guided by the Multiple Use Sustained Yield Act of 1960, the Forest Service is directed to balance the provision of goods and services from forest lands with the productive capacity of the land. Additionally, the Travel Management Rule directs the Forest Service to "consider the effects on National Forest System natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of National Forest System lands, the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated [for motor vehicle use]; and the availability of resources for that maintenance and administration" (36 CFR 2012.55(a)). Furthermore, in designating areas such as camping corridors, the Forest Service must minimize "damage to soil, watershed, vegetation, and other forest resources; harassment of wildlife and significant disruption of wildlife habitats; conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System Lands or neighboring Federal lands; and conflicts among different classes of motor vehicle uses..." (§212.55(b)).

• Page 167, response to comment 29-1j. The first paragraph of the Forest Service response incorrectly refers to MDC as "areas." This paragraph is deleted as shown below in strike-through and replaced with the underlined text as follows:

As discussed in Chapter 1 of the EA, the South Zone of the Kaibab National Forest has been managing its transportation program in compliance with the Travel Management Rule (and thus E.O. 11644) since implementation of decisions in 2010 and 2011 on the Williams and Tusayan Ranger Districts, respectively. It is within the authority of the Forest Service under the TMR to designate areas for limited motor vehicle use for dispersed camping (36 CFR 212.51(b)), so long as the criteria outlined in §212.55 are met. These criteria were taken into account in the development of the proposed action and alternatives for the Travel Management Revision Project. The EA has been updated to more explicitly describe this process.

As discussed in Chapter 1 of the EA, the South Zone of the KNF implemented Subpart B designation decisions made under and in compliance with the TMR in 2010 and 2011 in the Williams and Tusayan Ranger Districts, respectively. The TMR authorizes the Forest Service to include in the designation of roads the limited use of motor vehicles within a specified distance from those roads for the purpose of dispersed camping. 36 CFR 212.51(b). In authorizing MDC, the Forest Service must consider the general criteria in 36 CFR 212.55(a). These criteria, as well as opportunities for mitigating potential effects, were considered in connection with authorization of MDC in the development of the proposed decision and alternatives for the Travel Management Revision Project.